

**1204-0474 SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

**Collecting Aggregate Participant Counts on a Monthly Basis for Workforce
Investment Act Title IB, Wagner-Peyser Act, National Emergency Grants, and
Reemployment Services Grants and Workforce Investment Act Title IB
Individual Records on a Quarterly Basis**

A. Justification

A-1. Reasons for Data Collection.

The American Recovery and Reinvestment Act of 2009 (The Recovery Act) was signed into law by President Obama on February 17, 2009—Division A Title VIII, P.L. 111-5. The Recovery Act is intended to preserve and create jobs, promote the nation's economic recovery, and assist those most impacted by the recession. The Recovery Act provides the U.S. Department of Labor and the public workforce investment system with unprecedented levels of funding for a number of employment and training programs to help American workers acquire new skills and get back to work. The programs impacted by the Act include Workforce Investment Act (WIA) Title IB; Wagner-Peyser Act, including Reemployment Services Grants; and National Emergency Grants.

A-2. Users, Purposes, and Consequences of Failure to Collect the Information.

This request for ICR approval is for a regular three year extension of OMB's emergency approval on May 20, 2009 (for six months) of ETA's request to modify the frequency of reporting and request the collection of some additional data elements¹ covered under OMB Control Number 1205-0420—Workforce Investment Act (WIA), Title I Adult, Dislocated Worker and Youth Activities Programs. This control number includes the following ETA forms: (A) Workforce Investment Act

¹ The additional data elements include:

- Individual participant records (WIA Title IB Programs)
- Number of participants enrolled in another WIA program (Recovery Act WIA Youth program)
- Number of out-of-school youth age 22-24 (Recovery Act WIA Youth program)
- Work readiness attainment rate (Recovery Act WIA Youth program)
- Summer employment completion rate (Recovery Act WIA Youth program)
- Distinction between staff-assisted services versus those that are provided virtually (Wagner Peyser Act Program)
- Referral to training, including WIA-funded training (Reemployment Services Grants)

Annual Report—ETA form 9091, (B) Workforce Investment Act Quarterly Report—ETA Form 9090, and (C) Workforce Investment Act Standardized Record Data—WIASRD and OMB Control Number 1205-0240—Wagner-Peyser and Veterans’ Employment and Training Services (VETS) Programs. This control number includes the following ETA forms: (A) ETA 9002 Report and (B) VETS 200 Report.

Failure to report timely performance results related to the use of Recovery Act funds would be in violation of section 1512 (Reports on the use of funds) of the Act. Subpart C of section 1512 states: “RECIPIENT REPORTS.—Not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a Federal agency shall submit a report to that agency.”

A-3. Technology and Obstacles Affecting Reporting Burden.

In order to comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of WIA participant data by using technology to the extent feasible and by providing uniform data elements and data definitions to states. All Recovery Act reports are submitted to ETA using a web-based form through a secure Internet website. However, states and local areas continue to decide the best technology for collecting individual case management data given their unique circumstances and resources availability.

A-4. Duplication.

To minimize the reporting burden, most of the proposed data elements are currently collected on participants and reported to ETA either on a quarterly basis (Wagner-Peyser Act Program and Reemployment Services Grants) or on an annual individual record basis (WIA Programs and National Emergency Grants). To meet the Recovery Act’s reporting requirements, ETA proposes that aggregate participant counts be reported to ETA on a monthly basis to improve timeliness and transparency of the data. For the WIA programs only, ETA also proposes that individual records (WIASRD) for both participants and exiters be provided to ETA on a quarterly basis. There is no change to the approved quarterly performance reporting requirements for these programs or to the approved annual performance report for WIA.

A-5. Small Business.

This collection does not impact small businesses.

A- 6. Consequences of Less Frequent Data Collection.

Although the Workforce Investment and Wagner-Peyser Acts are very specific about reporting requirements and reporting frequency, they do not contain reporting contingencies related to temporary funding increases. If the Department did not comply with the reporting requirements contained within this request, future funding for these programs may be compromised. Consequences of not performing the collection are described in number 2 above.

A-7. Special Circumstances Involved in Collection of Data.

This data collection effort does not involve any special circumstances.

A.8. Federal Register Notice and Consultation Outside the Agency

ETA engages in weekly consultations with states and also communicates with them through its website, via webinars and national/regional conferences on these performance collections as well on as other matters. On April 30, 2009, ETA published a Notice for comment request for OMB emergency review in the Federal Register (Vol. 74, No. 82, Pages 19985 through 19986). At that time the documents pertaining to this request were made available to the public (and are still available) on the RegInfo.gov website at <http://www.reginfo.gov/public/do/PRAMain>. No comments were received. A Notice was again published in the Federal Register on Tuesday, June 16, 2009 (Vol. 74, No. 114, Pages 28553 thru 28554). This time comments were received from the State of Ohio; please see below for the specific comments and ETA's responses.

Comment: Ohio is concerned that DOL is asking states to report on statistics and services for the same items that are provided in the quarterly reports. It may be more appropriate to ask for services that states don't currently collect on a quarterly basis or what services are the Stimulus participants receiving individually in the first 30 and 60 days.

Response: Consistent with the principles of transparency and accountability, ETA recognized the need to collect participant and performance information more frequently than quarterly to inform policymakers and the public about the progress of the Recovery Act's implementation. For the WIA Adult program, WIA Dislocated Worker program, and National Emergency Grants the only items that are on both the quarterly report (OMB Control Number 1205-0420) and monthly report (OMB Control Number 1205-0474) is the total number of participants served and the total number of participants in training. These overlapping data elements

are necessary to (1) compare the results of the monthly report with the quarterly report and (2) provide context to the other data elements collected on the monthly report. Although the majority of the data elements collected on the monthly report for the Wagner-Peyser Employment Services program (OMB Control Number 1205-0474) are also collected on the program's quarterly report (OMB Control Number 1205-0240), the monthly numbers provide a more robust, "real time" picture of the Recovery Act's implementation.

Comment: It may be appropriate for DOL to have states report on serious barriers to employment that would affect their ability to return to work quickly.

Response: Although this is a good suggestion, requiring states to report on serious barriers to employment would be difficult because the workforce system as a whole works with individuals that have a broad range of barriers to employment. Furthermore, many participants, including those with disabilities, may not be willing to self-report a barrier to their particular employment goal as barriers are generally specific to the work that an individual hopes to find.

We have reviewed some of the barriers that are identified by individuals applying for assistance through a One-Stop and believe that answers would be too subjective and would not render any uniform information for analyses. In addition, this very personal information, placed in a data base that many people can access, would have to be safeguarded for identification purposes as well as assurances that an individual's privacy is intact. This includes legal as well as personal health issues that could be identifiable.

Comment: Since Stimulus funding is one time funding it may be appropriate for DOL to ask states to report on the length of training an individual may be in to determine if funds are being utilized in short term training (6 months or less) or long term training (more than 6 months). Ohio also feels that it may be appropriate to break out the data by populations instead of WIA in general, for example, data on Dislocated Workers versus Adult populations.

Response: The length of time that an individual participates in training is captured in the individual record file (WIASRD). The WIASRD layout was modified to allow states to indicate which participants received services funded in part or in whole by Recovery Act funds. This type of identification, coupled with existing data elements, will allow ETA to identify the length of training provided and the

outcomes achieved by these participants once they have completed the program services.

Comment: Finally, any additional reporting requirements add additional time on to the current workload of state staff and monthly reporting can be burdensome.

Response: For all monthly reports, data elements are taken from existing reporting requirements, with two exceptions (one for Wagner-Peyser Reemployment Services and one for WIA Youth Recovery Act services). This was done to keep the reporting burden on states to a minimum.

In addition to the comments we have formally received from Ohio, ETA has received a number of informal comments/issue during the implementation of the monthly reports. The feedback resulted in a number of technical changes to the reporting specifications. The most significant changes involved the reporting of self-service participants for the Wagner-Peyser Employment Service program (form ETA-9147).

Issue: What changes were made to form ETA-9147 (Wagner-Peyser Employment Service and Reemployment Services Grants Monthly Report)?

Clarification: The only change to the reporting instrument was to gray-out "Self-Service Referrals to WIA Services" as a reporting item.

Issue: What changes were made to the reporting specifications for form ETA-9147?

Clarification: There were a number of changes made to the self-service specifications for the Wagner-Peyser Employment Service program. The modified specifications no longer reference the need to receive "Workforce Information Services" as a requirement for all types of self-service activities. Furthermore, the specifications make a distinction between self-service only participants from those receiving staff-assisted services.

Issue: Attachment B of TEGl 24-08: The definition and specification for the age categories on form ETA-9149 (Youth Served with WIA Recovery Act Resources) do not match. The definition uses age as of "first recovery act service date" while the specification uses age as of two dates "beginning of the report period" and "end of the report period." For example, if a participant is 16 at the beginning of the

reporting period and 17 at the end of the reporting period (i.e., his/her birthday was in the middle of the month); then he/she would not be covered by the specifications as they are currently written.

Clarification: The specifications for form ETA-9149 was updated as follows:

Performance Item		Report Specifications	
		Current Month	Program-to-Date
Age	14-18	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and DATE OF FIRST YOUTH SERVICE is not null and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=14 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 18	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and (DATE OF EXIT >= 20090501 or DATE OF EXIT is null) and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=14 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 18
	19-21	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and DATE OF FIRST YOUTH SERVICE is not null and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=19 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 21	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and (DATE OF EXIT >= 20090501 or DATE OF EXIT is null) and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=19 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 21
	22-24	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and DATE OF FIRST YOUTH SERVICE is not null and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=22 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 24	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and (DATE OF EXIT >= 20090501 or DATE OF EXIT is null) and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) >=22 and (DATE OF FIRST YOUTH SERVICE - DATE OF BIRTH) <= 24

Issue: The data element “Number of participants receiving employment services” has been replaced on form ETA-9149 with a new data element “Number of participants transitioning into unsubsidized employment.” This change was done partly because we now recognize that since the goal of the youth summer program to provide employment services, this data element if reported correctly does not vary significantly from the total number of participants. More importantly collecting information on the “Number of participants transitioning into unsubsidized employment will provide a programmatic indicator of a successful employment outcome for summer youth participants.

Performance Item	Definition
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14. Number of participants transitioning into unsubsidized employment	The sum of participants who participate in either summer youth employment or a work experience outside the summer months that subsequently transition into unsubsidized employment.
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Performance Item	Report Specifications	
	Current Month	Program-to-Date
14. Number of participants transitioning into unsubsidized employment	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and (DATE OF EXIT >= beginning of the report period or DATE OF EXIT is null) and RECEIVED SUMMER EMPLOYMENT OPPORTUNITIES = 1 or PLACED IN WORK EXPERIENCE = yes and EMPLOYMENT IN 1ST QUARTER AFTER EXIT QUARTER = 1	Count of UNIQUE RECORDS where YOUTH and DATE OF FIRST YOUTH SERVICE <= end of the report period and (DATE OF EXIT >= 20090501 or DATE OF EXIT is null) and RECEIVED SUMMER EMPLOYMENT OPPORTUNITIES = 1 or PLACED IN WORK EXPERIENCE = yes and EMPLOYMENT IN 1ST QUARTER AFTER EXIT QUARTER = 1

A-9. Payments to Respondents.

There is no payment to respondents other than the formula funds provided in the Workforce Investment, Wagner-Peyser, and Recovery Acts.

A-10. Confidentiality.

ETA is responsible for protecting the confidentiality of the performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. The aggregate information collected through this request does not contain any individually identifying information. For WIA individual records (WIASRD), states will continue to submit records on individuals, but they will submit them with a unique individual identifier, which must not be the individual's social security number.

A-11. Questions of a Sensitive Nature.

The data collection includes no questions of a sensitive nature.

A-12. Respondents' Burden and Cost of Collecting Information.

The reporting requirements related to this request, which duplicates the emergency request for approval approved by OMB on May 20, 2009, strive to keep the additional reporting burden to a minimum, while ensuring that ETA collects the necessary information to report timely information to stakeholders about the use

of the Recovery Act funds. The following explanation reiterates the one stated in the request approved by OMB on May 20, 2009.

(1) WIA Adult and Dislocated Worker Programs and National Emergency Grants

The additional burden on states for providing monthly reports on data that they currently collect for the WIA Adult and Dislocated Worker Programs and National Emergency Grants is estimated to be **26** hours per month per state, which equates to **312** hours per year per state.

To estimate response burden for the monthly reporting of aggregate participant counts, the WIA Quarterly Report (ETA-9090) was used as a proxy. The WIA Quarterly Report has 44 items for which states provide data for the current quarter and cumulative 4-quarter reporting period. Twenty-one of these items are complex, as they require complex calculations or matching records to wage records (i.e., outcomes). This analysis assigns a weight of one to the basic items, and a user defined weight of 1.8 for these complex items.

The OMB approved burden hours for the WIA Quarterly Report is 160 hours per quarter per state.

Data Elements:

Number of basic items	23
Number of complex items	21

Estimated Burden Hours per Item:

Weight of basic item	1	
Hours needed for basic item		2.64
Weight of complex item	1.8	
Hours needed for complex item	4.752	

Calculated Burden Hours:

Total hours needed for basic items	60.72
Total hours needed for complex items	99.792
Total burden hours	160

The proposed monthly reporting form for the Recovery Act for these programs contains 39 items. None of these items is complex, since outcome data/calculations are not required. The following items provide an estimated burden for this new reporting form based on the WIA Quarterly Report calculations above.

Burden Hours per State:

Number of basic items	39
Hours needed for basic item	2.64
Calculated burden hours (monthly)	103
Total burden hours (monthly)	26*
Total burden hours (annualized)	312

* = the calculated monthly burden hours (i.e., 103 hours) includes the collection of the data elements. The collection of the data elements for this monthly report is already accounted for in OMB Control No. 1205-0420. Thus, the additional monthly burden (i.e., 26 hours) for state grantees to report on data that is already being collected is estimated to be .25 of the total calculated burden.

(2) Youth Summer Employment

The additional burden on states for providing monthly reports on Youth Summer Employment is estimated to be estimated to be **29** hours per month per state, which equates to **348** hours per year per state.

Using the same technique based on the WIA Quarterly Report approved burden hours of 160 per quarter per state, the hours need to complete each basic item is 2.64 and each complex item is 4.752 (see above).

The proposed monthly reporting form for the WIA Youth stimulus funds has 31 items. Two of these items are considered complex because they are leading indicators that require a calculation.

Burden Hours per State:

Number of basic items	30
Hours needed for basic item	2.64
Total hours needed for basic items	79.20
Number of complex items	2

Hours needed for complex item	4.752
Total hours needed for complex items	9.504
Calculated burden hours (monthly)	89
Total burden hours (monthly)	29*
Total burden hours (annualized)	348

* = the calculated monthly burden hours (i.e., 89 hours) includes the collection of the data elements. With the exception of the four data elements listed on page one of this justification, the collection of the data elements for this monthly report is already accounted for in OMB Control No. 1205-0420. Thus, the additional monthly burden (i.e., 29 hours) for state grantees to report on data that is already being collected plus the four data elements is estimated to be .33 of the total calculated burden.

(3) Wagner-Peyser Act, including the Reemployment Services Grants

The additional burden on states for providing monthly reports on data they currently collect and for tracking services provided virtually for the Wagner-Peyser Act, including the Reemployment Services Grants is estimated to be **9** hours per month per state, which equates to **108** hours per year per state.

To estimate response burden for the monthly reporting of aggregate participant counts, the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports (ETA-9002A-E and VETS-200A-C) were used as a proxy. The Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports have 1,855 items for which states provide data. Four hundred eighty one of these items are complex, as they require complex calculations or matching records to wage records (i.e., outcomes). This analysis assigns a weight of one to the basic items, and a user defined weight of 1.8 for these complex items.

The OMB approved burden hours for the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports is 2,443 hours per quarter per state.

Data Elements:

Number of basic items	1,374
Number of complex items	481

Estimated Burden Hours per Item:

Weight of basic item	1	
Hours needed for basic item		1.09
Weight of complex item	1.8	
Hours needed for complex item		1.96

Calculated Burden Hours:

Total hours needed for basic items		1,497.66
Total hours needed for complex items	943.72	
Total burden hours		2,443

The proposed monthly reporting form for the Wagner-Peyser Act, including the Reemployment Services Grants contains 25 items (17 for staff assisted services and 8 for self services). None of these items is complex, since outcome data/calculations are not required. The following items provide an estimated burden for this new reporting form based on the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports calculations above.

Burden Hours per State:

Number of basic items	25	
Hours needed for basic item		1.09
Calculated burden hours (monthly)		27
Total burden hours (monthly)	9*	
Total burden hours (annualized)		108

* = the calculated monthly burden hours (i.e., 27 hours) includes the collection of the data elements. With the exception of the two data elements listed on page one of this justification, the collection data for this monthly report is already accounted for in OMB Control No. 1205-0240. Thus, the additional monthly burden (i.e., 9 hours) for state grantees to report on data that is already being collected plus the two data elements is estimated to be .33 of the total calculated burden.

(4) WIASRD Participant/Exiter Files on a Quarterly Basis

The additional burden on states for providing WIASRD files on a quarterly basis on both participants and exiters using the currently approved individual

record layout is estimated to be **2,653** hours per quarter per state, which equates to **10,614** hours per year per state.

The WIASRD burden considers the amount of information collected and reported on the WIASRD that would not have to be collected by the states as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected solely to comply with the WIASRD federal reporting requirements. The WIASRD estimate also does not include the burden associated with collecting and reporting information required to meet EEO requirements, which is covered under a separate burden estimate.

The WIASRD burden varies by participant based on the intensity of services provided and the number of WIASRD elements applicable to the participant. For example, considerably more information is reported on WIA youth than WIA adults and collecting the youth literacy, numeracy, and skill attainment elements is more burdensome than collecting other types of data elements. On the other hand, web-based registrations and the use of wage records for measuring outcomes help to minimize the burden of data collection.

The WIASRD data collection burden calculation uses a minutes per record estimate. The minutes per record estimate is derived from the count of WIASRD data elements that are required for the record type, as well as the relative burden of collecting that data. For example, as mentioned above, it is relatively time consuming to collect each WIA youth literacy, numeracy, and skill attainment element, and there are significantly more data elements that must be collected for WIA youth than for WIA adults. Therefore, youth records have relatively higher minutes per record estimates.

The currently approved WIASRD data collection (OMB Control Number 1205-0420) estimate is 604,982 hours, based on PY 2002 exiter counts (599,621—435,355 Adult, Dislocated Worker, and National Emergency Grant and 164,266 Youth). The burden estimate calculation below reflects an increasing number of program participants and quarterly reporting.

Record Type	PY 2007 Annual National Counts (Participants and Exiters)	Minutes Per Record ¹	National Burden Hours
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Adult, DW, NEG	3,229,636	17.7	952,743
Youth	249,060	54.3	225,399
Total Burden	3,478,696		1,178,142
Additional Burden ²	1,178,142 - 604,982		573,160

¹ = The estimate of the minutes per record is based on the OMB control number 1205-0469 (Workforce Investment Streamlined Performance Reporting).

² = The currently approved annual WIASRD data collection (OMB Control Number 1205-0420) is 604,982 hours. These hours are included in the 1,178,142 hours calculated above, thus the total increase in burden due to this request modify the reporting of WIASRD data to include additional participant records and to change the frequency from annual to quarterly reporting is estimated to be **573,160** hours.

The additional burden estimates equates to an average of **10,614** hours per year per state (573,160 hours divided by 54 states and territories).

A-13. Annual Cost to Respondents.

There are no annualized costs to respondents.

A-14. Annualized Federal Cost.

There are no annualized Federal costs.

A-15. Reasons for Change in Burden.

There are no changes in burden from the previous request approved by OMB on May 20, 2009.

16. Publication Information.

Accountability guidelines for the Act emphasize data quality, streamlining data collection, and collection of information that demonstrate measurable program outputs. Consistent with the law, ETA makes the reported information publicly available through the Administration's Recovery website.

17. Display of OMB Expiration Date.

The proposed web-based data collection instrument will display the approved OMB control number, expiration date, and burden statement.

18. Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. Use of Statistical Methods

This collection does not employ statistical methods.